

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

v.

AARON EUGENE BJARNASON

**FILED UNDER SEAL PURSUANT TO 18
U.S.C. § 3509(d)(2) AND LOCAL RULE
49.1(c)(1)(G)**

Case No. 22-MJ-653 (JFD)

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Matthew Vogel, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the United States Department of Justice, Federal Bureau of Investigation (FBI), and have been so employed since July 2010. I am currently assigned to the Minneapolis Division and the Minnesota Child Exploitation Task Force, where my investigative responsibilities include investigation of child sexual abuse and exploitation crimes such as production, possession, receipt, and distribution of child pornography. I have gained knowledge and experience through training at the FBI Academy, in service training, and everyday work in conducting these types of investigations. I have received training in the area of child pornography and child exploitation investigations and have reviewed numerous examples of child pornography as defined at 18 U.S.C. § 2256, in various forms of media, including computer media.

2. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7), and am empowered by 18 U.S.C §§ 3052 and 3107 to conduct investigations of, and to make arrests for, violations of federal criminal statutes.

PURPOSE OF AFFIDAVIT

3. I make this affidavit in support of an application for a Criminal Complaint charging AARON EUGENE BJARNASON (DOB XX/XX/1999¹) with Production of Child Pornography and attempt in violation of 18 U.S.C. §§ 2251(a) and (e); Distribution of Child Pornography and attempt in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1); Cyberstalking in violation of 18 U.S.C. §§ 2261A(2)(B) 2261B; and Threatening Communications with Intent to Extort in violation of 18 U.S.C. § 875(d) as follows:

COUNT 1: From at least on or about May 10, 2022 and continuing through on or about May 18, 2022, in the District of Minnesota and elsewhere, AARON EUGENE BJARNASON attempted to and did employ, use, persuade, induce, entice, and coerce Minor Victim 1, who was then approximately 16 years old, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, transported in and affecting interstate and foreign commerce, and was produced and transmitted using materials that had been mailed, shipped, and transported in and

¹ Per local rules and 18 U.S.C. § 3509, I have partially redacted personally identifying information, such as dates of birth, from this affidavit. Unless otherwise noted, this information is known to me and available to the Court.

affecting interstate and foreign commerce by any means, including by computer, all in violation of 18 U.S.C. §§ 2251(a) and (e);

COUNT 2: On or about May 18, 2022, in the District of Minnesota and elsewhere, AARON EUGENE BJARNASON knowingly distributed a visual depiction, to wit, an image file identified as b~EioSFVvk0SUxMZmpXbEdDQ0dBM3pabIV4eRoAGgAiBgj6l7iVBjIBAVAEYAE~v4.jpeg using a means or facility of interstate commerce by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct, all in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1). The file is described as a side-by-side combination of two images of Minor Victim 1. On the left is an image of Minor Victim 1 clothed. It has a watermark with a publicly available social media profile ID. On the right is an image of Minor Victim 1 sitting fully nude with her legs spread to display her vagina. Two fingers are used to spread the labia;

COUNT 3: From at least on or about March 24, 2022 through at least on or about May 18, 2022, in the District of Minnesota and elsewhere, AARON EUGENE BJARNASON did, with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, to wit Minor Victim 1, use the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a

course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to Minor Victim 1, all in violation of 18 U.S.C. §§ 2261A(2)(B) and 2261B; and

COUNT 4: From on or about May 11, 2022 through on or about May 18, 2022, in the District of Minnesota and elsewhere, AARON EUGENE BJARNASON, with intent to extort from any person, firm, association, or corporation, any money or other thing of value, did transmit in interstate or foreign commerce any communication containing any threat to injure the property or reputation of the addressee or of another, or a threat to accuse the addressee or any other person of a crime, all in violation of 18 U.S.C. § 875(d). The threatening communications, further detailed herein, included reference to the sexually explicit images described above and the statement, “I’m gonna start sending the collages out to all the guys u follow then [Person 2] later today good job [Minor Victim 1.]”

4. The facts set forth in this affidavit come from my personal observations, my training and experience, evidence gathered pursuant to a prior consent search, and information obtained from other law enforcement officers. Because this affidavit is submitted for the limited purpose of establishing probable cause to support the contemporaneously filed application, it does not include each and every fact known to me or to other investigators.

PROBABLE CAUSE

5. Because the communications described herein occurred between parties in different locations in the United States and the records discussed use timestamps in Universal Time Coordinated (UTC), dates shown below are “on or about” dates. For example, if a victim sent a message from Minnesota at 12:30 A.M. on January 1, 2022, local time, it would still be December 31, 2021 for a suspect receiving the message in Oregon.

Minor Victim 1²

6. On May 18, 2022, Person 1 contacted the Carver County Sheriff’s Office and the FBI to report that she discovered her daughter, Minor Victim 1, age 16, was in communication with an adult male on Snapchat and Instagram. The adult male used the name “Matthew Erns,” Snapchat ID matthew_erns7, and Instagram ID forrex012. Person 1 reviewed Minor Victim 1’s phone and found that “Matthew Erns” was threatening Minor Victim 1 in relation to sexually explicit videos she produced at his direction and sent to him. Person 1 reported that Minor Victim 1 had recently been suicidal and hospitalized twice. Person 1 reported a belief the situation had been ongoing for approximately a year.³

² Unless otherwise noted, anonymized names are known to me and available to the Court upon request.

³ As documented in greater detail below, no evidence has yet been discovered to suggest that Bjarnason became directly involved with Minor Victim 1 prior to May 2, 2022. There is evidence suggesting Minor Victim 1 has been targeted by financially motivated cybercrime schemes in the past.

7. Victim 1 was interviewed by an FBI Child/Adolescent Forensic Interviewer. The interview was audio and video recorded, and I observed the interview live by video feed. Minor Victim 1 disclosed that within the past couple of months, she was contacted on Instagram by a person she knew as “Matthew.” Matthew paid Minor Victim 1 compliments and the messages began at a time when Minor Victim 1 has recently ended a relationship. Minor Victim 1 originally told Matthew she was 18 and Matthew stated he was 23. Matthew asked for pictures and videos of Minor Victim 1. Matthew offered to pay Minor Victim 1 \$2,000 for videos depicting Minor Victim 1 naked, “fingering” herself, and sucking on her fingers. Matthew never followed through with his promise to pay Minor Victim 1. At first, Minor Victim 1 felt okay with what Matthew was asking her to do, but within a few days, she felt that she no longer wanted to make videos for Matthew. Minor Victim 1 disclosed to Matthew that she was in fact 16 years old. After Minor Victim 1 disclosed that she was a minor, Matthew became much more aggressive. He demanded that Minor Victim 1 take sexually explicit images and videos with specific direction about what they should depict and what she should say. Matthew threatened that if Minor Victim 1 did not do as directed, he would release naked pictures of Minor Victim 1 to her friends, family, and school. The threats came when Minor Victim 1 was at home and at school. At one point, Matthew demanded that Minor Victim 1 take a call from him. She protested that she was in school. He said, “too bad” and directed her to go to the bathroom and talk to him.

8. Minor Victim 1 estimated she sent approximately 30 to 40 videos to Matthew doing the things he directed her to do.

9. Person 1 consented to the search Minor Victim 1's phone. Law enforcement took the phone and conducted a forensic examination of the device. I have received and reviewed a copy of that device and made the following observations:

- a. Around March 21, 2022, Minor Victim 1 took screenshots of Instagram chats between herself and another account in her own name. Based on the context, I believe the chat is between a new account Minor Victim 1 created and a previous account which had been taken over by an unidentified party. For example, other messages in Minor Victim 1's phone reference her Instagram account being controlled by a hacker. The old account directed Minor Victim 1 to create a video promoting another profile's ability to make investors rich. Minor Victim 1 was directed to promote "Anthony fx."⁴ The person promised Minor Victim 1 could have her account back after she promoted the investment scheme.
- b. In March and April, 2022, Minor Victim 1 received messages from friends asking about her "old account." Minor Victim 1 stated her account had been hacked. Friends reported that the new user was sending out messages pretending to be Minor Victim 1 and asking for "help."

⁴ According to Meta Platforms records, the "Anthony fx" account was created and accessed in Nigeria and is not believed to be directly related to Bjarnason's activities, however, as described below, Bjarnason likely sent a message to the person controlling that account about Minor Victim 1 on the Target Instagram ID.

- c. On and after May 9, 2022, the device contained several images and videos depicting Minor Victim 1 posing naked. Some of the images and videos depicted Minor Victim 1 drooling and spitting on herself, masturbating, inserting a hairbrush handle in her vagina, and engaged in other sexually explicit poses.
- d. On May 18, 2022, the device was used to take screenshots of profile pages for Instagram user forrex012 and Snapchat ID matthew_erns7.
- e. The device contained limited chat content with the aforementioned Snapchat and Instagram accounts.

10. In a follow-up interview with Person 1, I learned that Minor Victim 1 did not provide Matthew with any information on her family, but Matthew knew information about Minor Victim 1's family friends, cousins, her sisters, and her father.

Snap and Meta Platforms Search Warrants

11. On August 1, 2022, I applied for and was granted search warrants for Instagram ID forrex012 and Snapchat ID matthew_erns7 (*see* 22-MJ-623(JFD) and 22-MJ-624(JFD)). In reviewing responsive records, I made the following observations:

Snapchat ID matthew_erns7

12. Interaction with Minor Victim 1 began on May 9, 2022, with Matthew sending Minor Victim 1 a video depicting a young woman drooling with her mouth open and addressing "daddy." Minor Victim 1 responded with a video depicting herself posing

naked and drooling with her mouth open. On May 10, 2022, Matthew wrote⁵, “I want you to take a video like with your back camera flash on, save up a lot of spit and talk dirty to me. Say please daddy i wanna feel ur cum slide down my throat. And make this video long like over a minute like this example.” Matthew then sent another video depicting a young, unidentified female drooling off the end of her extended tongue. Matthew continued:

then another much longer video of you playing with yourself in this position, i wanna see you sticking your tongue out and drooling on your tits and pussy too make this video also at least a minute.

I wanna hear you moaning and talking dirty in that

Then this one is the most important

I want you to suck on your fingers or an object that looks like a cock like a hairbrush or something and show me how you’d suck my cock.

I want you to be sloppy and make a mess make sure i can see your eyes good and make this video the longest.

After you’ve sent these i’ll send you a bonus if you follow my directions well to make up for today. Because still as of right now I am not happy with you.

Like seeing you had time to post two tiktoks today but not even message me hello makes me very disappointed in you

I want u to tell me in every video that youre gonna be a good girl and that you are a good girl

also make sure your camera is recording at the highest fps setting

“daddy i’m sorry for being a bad girl, I’m your little slut and i’ll do whatever you tell me to do. You can use me however you want i’ll be a good girl and swallow your cum with your dick down my throat.”

Obviously it won’t be word for word but that idea and tell me ur a good girl

13. On May 15, 2022, Matthew continued directing Minor Victim 1 to produce and send him sexually explicit content. For example, over the following days, he wrote:

⁵ Unless otherwise noted, I have quoted text as written throughout, including typographical errors.

Make it at least a minute long and look into the camera with your eyes open big and beg for me to cum down to ur throat. Tell me how much of a slut you are for my dick and how you want to polish my cock with your mouth. Then I want you to watch this example video from reddit and make one like it. Have the camera up high like i'm there and look up into the camera. Then the last thing I want u to do is very easy. I want you just to try on a bunch of different sexy clothing on for me and take it off and try other stuff on all in one video. Like a 5 minute video dressing and undressing in good lighting.

Have your hair in a bun for that video

I also want you to record a video sucking on that comb you used to fuck your pussy. I want you to suck it just like a cock, back camera with flash on. be good and sloppy and moan

Then I want you to make a video saying this "daddy i'm your little slut and i'm your cum dumpster. Please jerk your cock off with my mouth and use my body for your pleasure. I'm your little bitch daddy i'm your little slave."

14. On May 18, 2022, Matthew wrote that he was going to "friend request [Minor Victim 1's father]." Minor Victim 1 responded, "no please i just really want to be done with this i feel disgusting." Matthew continued pressing Minor Victim 1 for videos. Minor Victim 1 protested, "i am at school." Matthew wrote, "i'm fucking tired of waiting i'm mad asf run." Minor Victim 1 replied, "ok i'm sorry this is why it would be better if you found someone else i'm a young high school student." Matthew's response was "that's too bad. you did this to yourself."

15. On May 18, 2022, Matthew continued by saying "I made something last night." Matthew then sent Minor Victim 1 a series of composite images depicting Minor Victim 1 posing naked and engaged in sexually explicit conduct such as masturbating, posing naked to display the vagina and anus, and drooling in a fashion simulating semen falling from her mouth. These sexually explicit images were set next to images Minor Victim 1 had posted on her social media accounts such as TikTok. The comparisons appear

to be focused on proving the person depicted in the pornographic content is the same person in the social media posts. Several items in Minor Victim 1's room are shown in each side of the image. Minor Victim 1's full name is visible in at least some of the composite images. Matthew wrote, "proof it's you." Minor Victim 1 pleaded with Matthew to stop. He replied, "okay deals off. I'm gonna start sending the collages out to all the guys u follow then [Person 2] later today good job [Minor Victim 1]." Matthew then placed two unanswered audio calls. Minor Victim 1 wrote, "can we please just end this wait stop what can i do? your 23 you realize how thag looks for you too" Matthew's reply was, "idgaf⁶ u admitted you've had [...] time so if this isn't important to you it's not to me but i'm sure all ur guy friends will love seeing these."

16. Minor Victim 1 continued to plead with Matthew to stop. The record of their conversation ended on May 18, 2022.

17. Images and videos contained in the account included sexually explicit images of Minor Victim 1. For example, On May 18, 2022, matthew_erns7 sent Minor Victim 1 an image identified as b~EioSFVvk0SUxMZmpXbEdDQ0dBM3pablv4eRoAGgAiBgj6l7iVBjIBAVAEYAE~v4.jpeg. The file is a side-by-side combination of two images of Minor Victim 1. On the left is an image of Minor Victim 1 clothed. It has a watermark with a publicly available social media profile ID. On the right is an image Minor Victim 1 sitting fully nude with her legs spread to display her vagina. Two fingers are used to spread the

⁶ "I don't give a fuck"

labia. Background elements in both pictures reflect that they were likely taken in the same place, consistent with the statement that the collages were created as “proof it’s you.”

18. As I reviewed the images in the matthew_erns⁷ account for content involving Minor Victim 1, I found a set of videos depicting Minor Victim 2, an identified 14-year-old girl from Tennessee. For example, on March 10, 2022, Minor Victim 2 sent a video identified as b~EioSFWFoU2Mzd09YV1dYYkIXc215OE1adhoAGgAiBgjj082SBjIBfVAEYAE~v4.mp4. The file is a video approximately 31 seconds in duration. Minor Victim 2 is seen posing naked kneeling on the floor. She says, “please cum down my fourteen-year-old throat daddy” and opens her mouth to show spit collected on her tongue. Based on this and other records received in response to the search warrants in this case, I believe that Bjarnason has engaged in similar conduct with additional minor victims located in other places.

forrex012

19. I reviewed the records for evidence regarding Minor Victim 1. A text search for Minor Victim 1’s first name yielded a message dated March 24, 2022 from Bjarnason to anthony._fx⁷. Bjarnason wrote, “How did u get [Minor Victim 1]’s account?” In my review of available records, this date is approximately five and a half weeks prior to the first known contact between Bjarnason and Minor Victim 1, indicating that Bjarnason likely had Minor Victim 1 under online surveillance for at least that long.

⁷ See discussion of Minor Victim 1’s compromised Instagram account.

20. Direct interaction with Minor Victim 1 began on May 2, 2022, with Bjarnason asking if Minor Victim 1 is “open to sugar daddies.” Consistent with information provided during her forensic interview, Minor Victim 1 initially represented herself to be 18. Bjarnason offered to pay Minor Victim 1 for photos and videos and sent a screenshot of a U.S. Bank mobile app screen showing bank balances for accounts -8848 and -8720 totaling \$17,021.85. Bjarnason wrote, “Here is proof of funds from my account that I primarily use for these kinds of arrangements.” Bjarnason offered his Snapchat ID as matthew_erns7 and email account bother808@gmail.com, the latter for Minor Victim 1 to send him a video stated to be too long to send in the Instagram messages.

21. On May 11, 2022, Bjarnason wrote, “We have a huge problem you better message me.” Several hours more passed until the next message from Bjarnason, “You have some explaining to do.” After approximately two hours, he continued, “I will be contacting [Person 2]. You are in so much trouble now.” After another approximately 20 hours passed, he wrote, “You can unsend whatever but I have everything saved.”

22. On May 12, 2022, Bjarnason engaged in a chat with an account in the name of Minor Victim 1’s mother, Person 1. Person 1 wrote, “she is a minor.” Bjarnason replied, “She lied to me the entire time about her age do you know what she’s done in the past?” From the context, some of the messages from Person 1 were not retained. Bjarnason claimed to have sent Minor Victim 1 \$2,500 “believing she was 18.” Bjarnason claimed, “Im wanting to inform her father which is a perfectly legal thing considering she’s committed many crimes with me and other men. Leaking them to her father is not a crime

[Person 1] and showing her family is also not a crime i'm informing them on her actions that is for awareness look it up it's not a crime." Bjarnason continued, "I recorded our entire conversation."

23. Based on the date of this chat, it is clear that Bjarnason knew or had reason to know that Minor Victim 1 was a minor no later than May 12, 2022, however Bjarnason's sexually focused chat with Minor Victim 1 continued through at least May 18, 2022.

24. On May 13, 2022, Minor Victim 1 sent a video file identified as video-1652473020.mp4. The video is approximately 0:15 in duration. It depicts Minor Victim 1 naked and masturbating. She is heard saying, "I'm a good girl, daddy" in a tone indicating she is near tears. Bjarnason replied, "Strip tease needs to be redone. I[t] needs to be longer and show your whole body." These comments are consistent with the directions given to Minor Victim 1 by Snapchat ID matthew_erns7.

25. Thereafter, Minor Victim 1 sent numerous sexually focused videos in which she is posing naked with her breasts displayed. She is heard saying, "I want your cum down my throat, daddy," "I wanna polish your cock with my spit, daddy," and "I'm your little cumslut, daddy."

26. In reviewing the account for images and videos depicting Minor Victim 1, I located several sexually explicit images and videos depicting other likely minor victims. These include images depicting girls posing naked and displaying their vagina, performing fellatio on unidentified males, and—consistent with Bjarnason's directions to Minor

Victim 1—posing naked, drooling on themselves, and making comments such as, “cum on me daddy.”

27. The summary information provided above for the Snapchat and Instagram account content is only a partial review of the accounts and does not include all relevant information about attribution or detail all content contained in the accounts.

Bjarnason’s Public Social Media Presence

28. I located publicly available social media accounts in Bjarnason’s name and bearing his images. These include Instagram ID aaronbjarnason and Facebook ID aaron.bjarnason.79.

Summary of Records Obtained Pursuant to Subpoenas

29. In response to an administrative subpoena, Meta Platforms provided subscriber and registration records and IP logs for Instagram ID 50936021565 (forrex012), Instagram ID 884365899 (aaronbjarnason), and Facebook ID aaron.bjarnason.79. Those records reflect the following information:

- a. Instagram ID 50936021565 (forrex012)
 - i. Registered Email: togoallday@gmail.com
 - ii. Registration Date: December 14, 2021
 - iii. IP logs show the account was accessed on IP address 67.171.177.253
- b. Instagram ID aaronbjarnason
 - i. Unique ID: 884365899
 - ii. Registered Email: aaronbjarnasonths@ gmail.com

- iii. Phone: XXX-XXX-7329 (Verified)⁸
 - iv. Account Created: December 30, 2013
 - v. IP Logs reflect usage on IP addresses in the vicinity of Portland, Oregon, including 67.171.177.253.
- c. Facebook ID aaron.bjarnason.79
- i. Registered Email Addresses: aaronbjarnasonths@gmail.com
 - ii. Other Email Address: rosswalkersrice@gmail.com
 - iii. Phones: XXX-XXX-7329⁹, XXX-XXX-3417¹⁰

30. In response to an administrative subpoena, Snap, Inc. provided subscriber and registration records and IP logs for Snapchat ID matthew_erns7. Those records reflect the following information:

- i. Display Name: Matthew
- ii. Account Created: November 16, 2021

⁸ In order to ensure accounts contain correct information, service providers often send a code to a user-provided phone number or email address. If the user validates access to the phone or account by entering the code, the facility is often registered as “verified” or “confirmed.”

⁹ This is the same phone number used to register the aaronbjarnason Instagram ID. The number appears to have been used before Bjarnason turned 18.

¹⁰ This is the same number assigned the Verizon IP addresses used to access matthew_erns7 discussed below.

- iii. Telephone Number: XXX-XXX-8433 (Verified) ¹¹
- iv. Current¹² Birthdate: November 15, 2004
- v. Previous Birthdate: May 15, 1998 (changed January 12, 2022)
- vi. User-Agent: The account was accessed on an iPhone 12, iPhone XS, and an iPad Pro.
- vii. IP Logs: IP logs show the account was accessed from IP address 67.171.177.253 geolocated in the vicinity of Portland, Oregon and a series of Verizon Wireless IPs.

31. In response to an administrative subpoena, Comcast Communications provided records about IP address 67.171.177.253. At the relevant date and time, the IP address was assigned to a subscriber at a Portland, Oregon apartment where Bjarnason is known to live. For example, according to U.S. Bank records, Bjarnason's residence address is the same as the Comcast subscriber address.

32. In response to an administrative subpoena, Verizon provided records about the phone account assigned the aforementioned Verizon IP addresses. Those IP addresses were assigned to telephone number XXX-XXX-3417. The subscriber is a person believed to be Bjarnason's father and Bjarnason is listed as the "contact" person on the account. Verizon records show the device assigned this number is an Apple iPhone 12, one of the

¹¹ The telephone number used here is a Voice over Internet Protocol service.

¹² As of the date records were produced.

devices used to access Snapchat ID matthew_erns7. The “contact name” on the account is Aaron Bjarnason. Based on publicly available social media posts and public records databases, I believe the subscriber for the account is likely a family member of Bjarnason.

33. In response administrative subpoenas, Google LLC provided records associated with the Google accounts connected to Bjarnason. Google records reflect the following subscriber and registration information:

- a. togosallday@gmail.com
 - i. Name: yung jo
 - ii. Account Created: December 14, 2021
 - iii. Creation IP: 67.171.177.253
- b. aaronbjarnasonths@gmail.com
 - i. Name: Aaron Bjarnason
 - ii. Created: October 16, 2013
 - iii. Recovery SMS: XXX-XXX-3417

34. In response to a federal grand jury subpoena, U.S. Bank provided records for bank accounts in Bjarnason’s name. U.S. Bank records show Bjarnason’s current address is the address listed on the Comcast Communications records for IP addresses used to access many of the email accounts shown above. U.S. Bank records also show Bjarnason’s cell phone number is XXX-XXX-3417 and email address is aaronbjarnasonths@gmail.com. Bjarnason has two U.S. Bank accounts with account numbers ending -8848 and -8720. This information is consistent with the screenshot sent

to Minor Victim 1 when Bjarnason provided proof of funds “from my account that I primarily use for these kinds of arrangements.” Transactions on the account include frequent transactions through online payment apps such as PayPal, Venmo, CashApp, and Zelle. Several of the small dollar online payments contain memos with apparent female names on them. Based on the facts presented above and my training and experience, I believe this may be consistent with payment for sexually explicit images of possible victims.

35. On November 27, 2020, account -8848 was used for a payment to Website 1. This site is a web forum that advertises itself as a “leaks forum” and a place where users can “find tons of leaks [and] share resources.” Topics include information on “how to hack a Snapchat account,” and other information on illegal activity, apparently pirated copyright protected content, and stolen account credentials.

CONCLUSION

36. This investigation remains ongoing, as are victim identification efforts.

37. Based on the foregoing, I submit there is probable cause as charged in the proposed criminal complaint that AARON EUGENE BJARNASON, in the District of

Minnesota and elsewhere, has violated 18 U.S.C. §§ 2251(a) and (e), 18 U.S.C. § 2252(a)(2) and (b)(1), 18 U.S.C. §§ 2261A(2)(B) and 2261B, and 18 U.S.C. § 875(d).

38. Accordingly, I request that a warrant issue for the arrest of AARON EUGENE BJARNASON that he may be brought before this Court.



Special Agent Matthew Vogel
United States Department of Justice
Federal Bureau of Investigation

SUBSCRIBED and SWORN before me
by reliable electronic means (Zoom and
email) pursuant to Fed. R. Crim. P.
41(d)(3) on August 11, 2022



THE HONORABLE JOHN F. DOCHERTY
UNITED STATES MAGISTRATE JUDGE